

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

SOLAN HOLDING, BV, SYNEXXUS  
COMPOSITES, et al.,

Plaintiffs,

Case No.: 1:22-cv-00786

vs.

GREGORY GLAROS, SYNEXXUS INC., et  
al.,

Defendants.

**DEFENDANTS' TRIAL EXHIBIT LIST**

Defendants Gregory Glaros, William Burns, and Synexxus, Inc., by and through their undersigned counsel, submit the following trial exhibit list:

1. Services Agreement between Synexxus, Inc. and Synexxus Composites, LLC dated April 15, 2019, with Exh. A – Statement of Work, dated September 1, 2021
2. Synexxus, Inc. Employment and Confidentiality Agreement between Synexxus, Inc. and Patrick Coughlin dated April 29, 2019
3. Non-Disclosure and Confidentiality Agreement between Synexxus, Inc. and Composite Builders, LLC dated July 5, 2021
4. Agreement Between The Govt of the Republic of India, Ministry of Defence & M/S Synexxus Composites LLC for Supply of One Multi-Role Carbon Fiber Vessel for Indian Navy dated August 31, 2021
5. Non-Standard Navy Cooperative Research and Development Agreement between Naval Surface Warfare Center, Carderock Division and Synexxus, Inc. dated October 14, 2021

6. Non-Disclosure and Confidentiality Agreement between Patricia Brooke Kerschbaumer and Synexxus Composites, LLC dated November 3, 2021

7. Convertible Promissory Note tendered by Synexxus Composites, LLC to Solan Holding BV in the amount of \$2,000,000 dated November 8, 2021

8. Services Agreement between Composite Builders, LLC and Synexxus Composites, LLC dated November 16, 2021

9. 60-Day Convertible Promissory Note tendered by Synexxus Composites, LLC to Solan Holding BV in the amount of \$1,000,000 dated December 20, 2021

10. Addendum to the 60-Day Convertible Promissory Note dated December 20, 2021 between Synexxus Composites, LLC and Solan Holding BV dated January 13, 2022

11. Operating Agreement for Synexxus Composites, LLC dated April 15, 2019, with updated Exh. A, List of Members, Units and Initial Capital Contributions dated as of January 1, 2022

12. Ghostworks Marine flyer promoting M80 Class boat (3-pages)

13. Photos of US Navy M80 prototype

14. Video of Deposition<sup>1</sup> of Cesar Elizaga taken on April 12, 2023

15. Video of Deposition of Patrick Coughlin taken on April 18, 2023

16. Stage I and Stage II Certificates of Completion received from the Republic of India, Navy.

17. Monthly Progress Reports submitted by Synexxus Composites to the Republic of India Navy (September 2021 through June 2022)

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<sup>1</sup> Defendants note that they will comply with Local Civil Rule 30(F) with respect to the presentation of depositions as evidence.

This list, pursuant to the Court's prior Order (ECF No. 59), does not include exhibits that Defendants may seek to introduce as impeachment or rebuttal evidence, and Defendants reserve the right to submit exhibits for the purposes of rebuttal and/or impeachment as may arise at trial.

Defendants further reserve the right to use any exhibit identified on Plaintiffs' exhibit list.

Defendants further reserve the right to use demonstrative, illustrative, and/or summary exhibits during trial to assist the trier of fact.

Defendants further reserve the right to add to or amend this disclosure as appropriate and/or necessary, including as contemplated by the Court's Order dated April 7, 2023 (ECF No. 102).

Dated: April 18, 2023

Respectfully submitted,

By: /s/  
Jason R. Hodge (VSB No. 90793)  
*Attorney for Defendants Gregory E. Glaros,  
Synexxus Inc., & William Burns  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
901 East Byrd Street, Suite 1650  
Richmond, VA 23219  
Telephone: (804) 533-3891  
Facsimile: (804) 616-4129  
jason.hodge@nelsonmullins.com*

Matthew S. Sturtz (admitted *pro hac vice*)  
*Attorney for Defendants Gregory E. Glaros,  
Synexxus Inc., & William Burns  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
100 S. Charles Street, Suite 1600  
Baltimore, Maryland 21201  
Phone: (443) 392-9400  
Facsimile: (443) 392-9499  
matt.sturtz@nelsonmullins.com*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court and served via ECF on all counsel of record registered to receive service via the Court's CM/ECF system.

/s/

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Jason R. Hodge (VSB No. 90793)  
*Attorney Defendants Gregory E. Glaros,  
Synexxus Inc., & William Burns*  
NELSON MULLINS RILEY &  
SCARBOROUGH LLP  
901 East Byrd Street, Suite 1650  
Richmond, VA 23219  
Telephone: (804) 533-3891  
Facsimile: (804) 616-4129  
jason.hodge@nelsonmullins.com